# IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TENNESSEE WESTERN DIVISION

DNV INVESTMENT PARTNERSHIP, DALE MENARD, S. EUGENE MATHIS JR., AND KENNETH A. GRINSPUN, ON BEHALF OF THEMSELVES AND ALL OTHERS SIMILARLY SITUATED, Plaintiffs,	) ) ) ) ) ) No. 2:14-cv-02232
<b>v.</b>	
REGENT PRIVATE CAPITAL LLC, REGENT PRIVATE CAPITAL II LLC, PREMIER NATURAL RESOURCES LLC, CHARLES STEPHENSON, AND LAWRENCE FIELD, Defendants.	) ) ) ) ) ) ) ) ) ) ) )

## CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT

Defendants Regent Private Capital LLC, Regent Private Capital II LLC, Premier Natural Resources LLC, Charles Stephenson, and Lawrence Field submit this Consent Motion for Extension of Time to respond to Plaintiffs' Complaint, after consultation with Plaintiffs, and state as follows:

1. As communicated to and agreed upon by Plaintiffs, counsel for Defendants accept service effective April 23, 2014 on behalf of all defendants, except for Regent Private Capital LLC ("Regent"). Counsel for Defendants decline to accept service for Regent on the basis that Regent is not subject to suit and has no legal existence, having dissolved effective December 31, 2012.

- 2. Plaintiffs consent to an Order granting Defendants until May 28, 2014 to serve an answer or move or otherwise respond to the Complaint.
- 3. Plaintiffs also agree that Defendants shall have no obligation to answer or otherwise respond to the original Complaint if an Amended Complaint has been served prior to May 28, 2014, but shall have thirty (30) days from the date of service of an Amended Complaint to answer or move or otherwise respond to such Amended Complaint.

#### ADAMS AND REESE LLP

By: /s/ J. Bennett Fox, Jr.\_

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## **CERTIFICATE OF CONSULTATION**

The undersigned certifies that counsel for Defendants have consulted with counsel for Plaintiffs and counsel for Plaintiffs stated that Plaintiffs consent to the relief requested herein.

/s/ J. Bennett Fox, Jr.
J. BENNETT FOX, JR.

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on May 5, 2014, a copy of the foregoing **Consent Motion for Extension** was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt.

/s/ J. Bennett Fox, Jr.
J. BENNETT FOX, JR.